

**jsimpson001@icloud.com**

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**From:** jsimpson001@icloud.com  
**Sent:** Saturday, May 10, 2025 7:46 AM  
**To:** 'Darren A. Pascarella'  
**Cc:** 'robert.lorenclaw.com'; 'Benjamin Robert Rajotte'; 'Eric Huebscher'  
**Subject:** Re: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of JJ ARCH LLC, suing derivatively as managing member of ARCH REAL ESTATE HOLDINGS LLC et al v. JARED CHASSEN et al [F-FID1934821]

Darren,

**CEASE AND DESIST**, the case has been “re” Removed to the Federal Court and until we hear back from the Court, your client is not authorized to do anything with the JJ Arch properties. Once the Federal Court guides us that will be governing authority given the 5.9.25 removal action (in effect on filing). There are also various appeals and emergency motions to deal with this very matter. Once we are in front of a Court of Competent jurisdiction, and due process commences, it will be clearly obvious that Chassen had no rights with respect to JJ Arch and he certainly had no grounds to ask for a Receiver. I suspect you know and are participating with 35 Oak in addition to Chassen but even if a Receiver was granted, this will not be fiduciary.

We've never met but you're going to learn a lot about me very quick here. I stand up for integrity, honesty, that's the highest level of requirements of anything in my life. You represent someone who is in conflict and has done nothing but illegal activity when he knew the federal court didn't give him authority to do so (he sought relief but no reply doesn't grant relief). And now you attempted to dupe the State Court to stretch above the Federal Court, all to participate in a horrific situation of collusion.

Robert is out. Ben has not made an appearance in SDNY yet so I am prose here (for now). I heard about your call and I learned about the trickery that you're trying to play into, which is actually participation in fraud. And if no lawyer wants to represent me in this matter (it's my life and business on the line) because of the games that you are now subscribing to, all good you and I will be speaking directly in a prose manner and I will be reporting to the various Courts tonight.

So let me know when you want to speak and you and I will work through this, or not.

And by the way, if there was a receiver, I am the only member of JJ Arch by actual contract. So any confirmation or acknowledgement that you are working on behalf of Allen Schwartz or Oak, is subject to serious sanctions.

Your client has EXTREME conflicts here. His assignment related to Jay Bialsky in Sag Harbor has a party named East End Ventures d/b/a 550 Metropolitan Ave LLC. 550 was a partner in the AREH development of that property. Chassen owns a condo in the building. JJ Arch owns the retail unit. Your client also hired Klestadt Winters and Southard on another matter but Southard works for Chassen against JJ Arch. Another conflict. There are others too.

The Police Reports of what actually happened with your client are now on the NYSCEF system. He is to return the \$24,000 that he took from the Citizens Bank account from 1640 Motors immediately as they are TRUST funds and are causing disruption to the business to make payroll and vendor payments.

PS - I asked your firm to help me with this litigation, sharing confidential information and of course another unethical lawyer that doesn't care about conflicts or ethics. This will be immediately raised with the NYS Bar Association. This is the 2<sup>nd</sup> notice I have shared on this issue with your firm.

646-753-2872, you know where to find me for a collegiate conversation.

All rights reserved and none waived.

Thank you

Jeffrey Simpson

Sent from my iPhone

On May 6, 2025, at 1:10 PM, Pascarella, Darren A. <[dpascarella@farrellfritz.com](mailto:dpascarella@farrellfritz.com)> wrote:

Thank you.

**Darren A. Pascarella** | Farrell Fritz, P.C.  
(516) 227-0797 | [dpascarella@farrellfritz.com](mailto:dpascarella@farrellfritz.com)

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**From:** Tiffany J. Klinger <[TJKLINGE@nycourts.gov](mailto:TJKLINGE@nycourts.gov)>  
**Sent:** Tuesday, May 6, 2025 1:10 PM  
**To:** Pascarella, Darren A. <[dpascarella@FarrellFritz.com](mailto:dpascarella@FarrellFritz.com)>  
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**Subject:** RE: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of JJ ARCH LLC, suing derivatively as managing member of ARCH REAL ESTATE HOLDINGS LLC et al v. JARED CHASSEN et al [F-F.FID1934821]

[Warning: External Email]

Good afternoon,

I have attached the update invite. I believe it is the same link but would suggest using the link in the attached email.

Thank you,

Tiffany J. Klinger  
Principal Law Clerk to the Hon. Joel M. Cohen  
60 Centre Street  
New York, NY 10007

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[Part 3 Sealing Practices](#)

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**From:** Pascarella, Darren A. <[dpascarella@FarrellFritz.com](mailto:dpascarella@FarrellFritz.com)>  
**Sent:** Tuesday, May 6, 2025 1:00 PM  
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**Cc:** [admin@spi-pc.com](mailto:admin@spi-pc.com); [tlf@msf-law.com](mailto:tlf@msf-law.com); [kaf@msf-law.com](mailto:kaf@msf-law.com); [jmiller@westermanllp.com](mailto:jmiller@westermanllp.com); [charles@cwertmanlaw.com](mailto:charles@cwertmanlaw.com)

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**Subject:** RE: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of JJ  
ARCH LLC, suing derivatively as managing member of ARCH REAL ESTATE HOLDINGS LLC et al v. JARED  
CHASSEN et al [F-F.FID1934821]

Good afternoon,

Will we be using the same MS Teams link that the court circulated yesterday at around 2:15pm  
(attached) for the status conference today? If not, kindly forward the link for today's conference.

Thank you,

**Darren A. Pascarella** | Farrell Fritz, P.C.  
(516) 227-0797 | [dpascarella@farrellfritz.com](mailto:dpascarella@farrellfritz.com)

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**From:** Tiffany J. Klinger <[TJKLINGE@nycourts.gov](mailto:TJKLINGE@nycourts.gov)>  
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<[Aishlinn.Bottini@haynesboone.com](mailto:Aishlinn.Bottini@haynesboone.com)>; Pascarella, Darren A. <[dpascarella@FarrellFritz.com](mailto:dpascarella@FarrellFritz.com)>  
**Cc:** [admin@spi-pc.com](mailto:admin@spi-pc.com); [tlf@msf-law.com](mailto:tlf@msf-law.com); [kaf@msf-law.com](mailto:kaf@msf-law.com); [jmiller@westermanllp.com](mailto:jmiller@westermanllp.com); charles  
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Benjamin Robert Rajotte <rajb@mllg.nyc>  
**Subject:** RE: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of JJ  
ARCH LLC, suing derivatively as managing member of ARCH REAL ESTATE HOLDINGS LLC et al v. JARED  
CHASSEN et al [F-F.FID1934821]

Some people who received this message don't often get email from [tjklunge@nycourts.gov](mailto:tjklunge@nycourts.gov). [Learn why this is important](#)  
[Warning: External Email]

Thank you for the notice, we will move this conference to tomorrow, May 6 at 4:00 pm.

Tiffany J. Klinger  
Principal Law Clerk to the Hon. Joel M. Cohen  
60 Centre Street  
New York, NY 10007

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[Part 3 Sealing Practices](#)

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**From:** robert lorenclaw.com <[robert@lorenclaw.com](mailto:robert@lorenclaw.com)>

**Sent:** Monday, May 5, 2025 2:25 PM

**To:** Tiffany J. Klinger <[TJKLINGE@nycourts.gov](mailto:TJKLINGE@nycourts.gov)>; Bottini, Aishlinn <[Aishlinn.Bottini@haynesboone.com](mailto:Aishlinn.Bottini@haynesboone.com)>; Pascarella, Darren A. <[dpascarella@FarrellFritz.com](mailto:dpascarella@FarrellFritz.com)>

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**Subject:** Re: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of JJ ARCH LLC, suing derivatively as managing member of ARCH REAL ESTATE HOLDINGS LLC et al v. JARED CHASSEN et al [F-F.FID1934821]

Good afternoon Ms. Klinger,

Plaintiffs Simpson and JJ Arch LLC incoming attorney, Mr. Benjamin Rajotte, Esq. (cced here) recently filed a notice of appearance. Further, Mr. Rajotte recently informed me that he has a conflict this afternoon at 4:00pm, but is available tomorrow at the same time.

Rob Lorenc

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**From:** Tiffany J. Klinger <[TJKLINGE@nycourts.gov](mailto:TJKLINGE@nycourts.gov)>

**Date:** Monday, May 5, 2025 at 12:49 PM

**To:** Bottini, Aishlinn <[Aishlinn.Bottini@haynesboone.com](mailto:Aishlinn.Bottini@haynesboone.com)>, robert lorenclaw.com <[robert@lorenclaw.com](mailto:robert@lorenclaw.com)>, Pascarella, Darren A. <[dpascarella@FarrellFritz.com](mailto:dpascarella@FarrellFritz.com)>

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**Subject:** RE: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of JJ ARCH LLC, suing derivatively as managing member of ARCH REAL ESTATE HOLDINGS LLC et al v. JARED CHASSEN et al [F-F.FID1934821]

Thank you all, we will schedule the conference for **4:00 pm today, May 5**. A Teams invite will be sent out.

Tiffany J. Klinger  
Principal Law Clerk to the Hon. Joel M. Cohen  
60 Centre Street

New York, NY 10007

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**From:** Bottini, Aishlinn <[Aishlinn.Bottini@haynesboone.com](mailto:Aishlinn.Bottini@haynesboone.com)>  
**Sent:** Monday, May 5, 2025 11:59 AM  
**To:** robert lorenclaw.com <[robert@lorenclaw.com](mailto:robert@lorenclaw.com)>; Pascarella, Darren A. <[dpascarella@FarrellFritz.com](mailto:dpascarella@FarrellFritz.com)>; Tiffany J. Klinger <[TJKLINGE@nycourts.gov](mailto:TJKLINGE@nycourts.gov)>  
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**Subject:** RE: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of JJ ARCH LLC, suing derivatively as managing member of ARCH REAL ESTATE HOLDINGS LLC et al v. JARED CHASSEN et al [F-F.FID1934821]

Dear Ms. Klinger,

608941 NJ Inc. (Oak) is available this afternoon.

Best regards,  
Aishlinn

## HAYNES BOONE

**Aishlinn Bottini** | Associate | She/Her/Hers  
[aishlinn.bottini@haynesboone.com](mailto:aishlinn.bottini@haynesboone.com) | (t) +1 212.659.4994

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**From:** robert lorenclaw.com <[robert@lorenclaw.com](mailto:robert@lorenclaw.com)>  
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<b>EXTERNAL:</b> Sent from outside Haynes and Boone, LLP
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Good morning Ms. Klinger,

I am available this afternoon and tomorrow as well.

Thank you,

Rob Lorenc

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**From:** Pascarella, Darren A. <[dpascarella@FarrellFritz.com](mailto:dpascarella@FarrellFritz.com)>  
**Date:** Monday, May 5, 2025 at 11:50 AM  
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**Subject:** RE: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of JJ ARCH LLC, suing derivatively as managing member of ARCH REAL ESTATE HOLDINGS LLC et al v. JARED CHASSEN et al [F-F.FID1934821]

Good morning,

We are proposed counsel to Eric Huebscher, as receiver. I am available both today and tomorrow at the stated times.

Thank you,

**Darren A. Pascarella** | Farrell Fritz, P.C.  
(516) 227-0797 | [dpascarella@farrellfritz.com](mailto:dpascarella@farrellfritz.com)

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**Sent:** Monday, May 5, 2025 11:17 AM  
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**Cc:** Ali Rawaf <[arawaf@nycourts.gov](mailto:arawaf@nycourts.gov)>; Brittany Zak <[Bzak@nycourts.gov](mailto:Bzak@nycourts.gov)>  
**Subject:** RE: RE: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of

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Thank you,

Tiffany J. Klinger  
Principal Law Clerk to the Hon. Joel M. Cohen  
60 Centre Street  
New York, NY 10007

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**From:** SFC-PART3

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**Subject:** RE: RE: 158055/2023 JEFFREY SIMPSON, individually and derivatively, as managing member of JJ ARCH LLC, suing derivatively as managing member of ARCH REAL ESTATE HOLDINGS LLC et al v. JARED CHASSEN et al

Good morning,

The Court would like to hold a brief virtual status conference to discuss next steps in this action. Please let us know if you are available today, May 5, 2025, at 4:00 pm or tomorrow, May 6, 2025, at 4:00 pm.

Thank you,

Tiffany J. Klinger  
Principal Law Clerk to the Hon. Joel M. Cohen  
60 Centre Street  
New York, NY 10007

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